

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Mary Ann L. Reyta	Debtor(s)	CHAPTER 13
Rocket Mortgage, LLC f/k/a Quicken Loans, LLC f/k/a Quicken Loans Inc.	Movant	
vs.		NO. 22-13081 AMC
Mary Ann L. Reyta	Debtor(s)	
Michael Greene, Sr.	Co-Debtor	11 U.S.C. Section 362
Kenneth E. West	Trustee	

**MOTION OF ROCKET MORTGAGE, LLC F/K/A QUICKEN LOANS, LLC F/K/A
QUICKEN LOANS INC.
FOR RELIEF FROM THE AUTOMATIC STAY
UNDER SECTION 362**

1. Movant is Rocket Mortgage, LLC f/k/a Quicken Loans, LLC f/k/a Quicken Loans Inc..
2. Debtor(s) and Co-Debtor, Michael Greene, Sr., are the owner(s) of the premises 2247 Larue Street, Philadelphia, PA 19137, hereinafter referred to as the mortgaged premises.
3. Movant is the holder of a mortgage, original principal amount of \$63,822.00 on the mortgaged premises that was executed by Debtor and Co-Debtor as Co-Mortgagors on April 10, 2017. The mortgage has been assigned as follows:

Mortgage Electronic Registration Systems, Inc., (“MERS”) as nominee for Quicken Loans Inc., to Rocket Mortgage, LLC, fka Quicken Loans, LLC dated 8/1/2022; recorded 8/3/2022.
4. Kenneth E. West, is the Trustee appointed by the Court.
5. The commencement and/or continuation of the mortgage foreclosure proceedings by reason of non-payment of monthly mortgage payments were stayed by the filing of a Chapter 13 Petition in Bankruptcy by the Debtor(s).
6. Co-Debtor, Michael Greene, Sr., who has not filed for Bankruptcy in this case, is liable on the mortgage loan secured by the aforesaid mortgage together with the Debtor.
7. As of March 6, 2023, the total payoff due on the mortgage is \$56,869.09.

8. Debtor(s) and Co-Debtor have failed to make the monthly post-petition mortgage payments in the amount of \$652.40 for the months of January 2023 through March 2023 with less of a suspense balance of \$626.97.

7. In addition to the other amounts due to Movant reflected in this Motion, as of the date hereof, in connection with seeking the relief requested in this Motion, Movant has also incurred legal fees and legal costs. Movant reserves all rights to seek an award or allowance of such fees and expenses in accordance with applicable loan documents and related agreements, the Bankruptcy Code and otherwise applicable law.

8. The total amount necessary to reinstate the loan post-petition is **\$1,330.23** (plus attorney's fees & costs).

9. Movant is entitled to relief from stay for cause.

10. This motion and the averments contained therein do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this motion, including fees and costs, due under the terms of the mortgage and applicable law.

WHEREFORE, Movant prays that an Order be entered modifying the Stay and permitting Movant to proceed with its mortgage foreclosure on the mortgaged premises, and to allow the Sheriff's Grantee to take any legal action to enforce its right to possession of the mortgage premises. Further, Movant prays that an Order be entered awarding Movant the costs of this suit, reasonable attorney's fees in accordance with the mortgage document and current law together with interest.

/s/ Denise Carlon, Esq.

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